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Mr. Dan Eden
Assistant Director
Hazardous and Solid Waste Division
Texas Water Commission
P.O. Box 13087 Capital Station
Austin, Texas 78711

To SF
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Re: RCRA Facility Assessment
Texaco Chemical Company
TX0009076846

Dear Mr. Eden:

We have reviewed the RCRA Facility Assessment (RFA) for Texaco Chemical Company in Port Neches, Texas, and agree with your recommendations, as presented in Parts III and IV of the report, that a RCRA Facility Investigation be required for the following units:

1. N.O.R.No.01: Landfill (Tract I)
2. N.O.R.No.03: Landfill (Tract II)
3. N.O.R.No.10: Container Storage Area
4. N.O.R.No.18: Bulk Storage Area

Recommendations for the Landfill (Tract I) and Bulk Storage Area as presented in sections I and II are different from those in III and IV of the RFA report. These two units should be included in the RFI. Analytical data and discussions of groundwater flow indicate that Landfill (Tract I) could have released contaminants handled in the unit (e.g. dichloropropane) to "upgradient" and downgradient wells. Contamination of the soils at the Bulk Storage Area lacks quantification.

EPA also requests that the following units be included in the RFI:

1. N.O.R. "A" Open Pit Burning Site
2. Ditch and Retention Pond
3. Jefferson Canal and Associated Dredge Spoils Piles
4. Wastewater Treatment Plant
5. Former Neches-Butane Units.

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The Open Pit Burning Site is a SWMU that does not meet the definition of "regulated unit." Documentation is needed concerning the closure requirements for this SWMU. The Ditch, Retention Pond, Wastewater Treatment Plant, and Former Naches-Butane Units have not been identified as SWMUs in the RFA report, but they are referenced in several sections of the report. Sediment in the Jefferson Canal is also reported in the RFA to be contaminated. There are indications that corrective action may be in process with all or some of these units. Additional documentation is needed.

We also agree that further investigations appear warranted at N.O.R. No.04 Landfill (Tract III). However, due to the specific parameters of concern (i.e. asbestos and pH), such activities should be included in the State's portion of the permit in lieu of the HSWA portion.

Thank you for your cooperation. If you have any further questions, please contact me or Erlece Allen of my staff at (214)655-6790.

Sincerely yours,

Sam Becker, P.E.
Chief
Hazardous Waste Compliance Branch

bcc: W. Honker (6H-CP)
B. Parr (6H-HS)
B. Taylor (6H-CE)
M. McKee (6H-ES) ✓